

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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ANTONIO DE JESUS, SERGIO FRANCISCO,)
JUAN GUTIERREZ, ALEXANDER FRANCISCO,)
JUSTO ACEVEDO, JAMIE LUNA PUJOLS,)
MARCOS BONOLA-LUCERO,)
RUBEN NUNEZ, GUSTAVO ESQUIVEL,)
FRANCISCO DE JESUS, LUIS PEREZ, AND)
JAVIER CRUZ)
)
)
Plaintiffs,)
)
v.)
)
60-05 MAIN STREET ENTERPRISES CORP.)
d/b/a PALACE DINER,)
GEORGE MANTZIKOS, and PETER MARKOS)
)
Defendants)
-----X	

13-cv-5492
(NGG)(RML)

**DECLARATION OF MELISSA BEEKMAN IN SUPPORT OF PLAINTIFFS'
MOTION FOR ATTORNEYS FEES AND COSTS**

Melissa Beekman, P.C., an attorney admitted to practice law in State of New York and the United States District Court for the Eastern District of New York, hereby declares upon information and belief under penalties of perjury as follows:

1. I am a Managing Attorney of the firm Bell Law Group, PLLC, formerly Law Office of Jonathan Bell and Bell Kilada, PLLC¹, attorneys for the Plaintiffs herein.
2. I submit this declaration in support of Plaintiffs' motion for attorneys' fees and reimbursement of expenses.

¹ On or about 2015, The Law Office of Jonathan Bell and Bell Kilada, PLLC, merged into Bell Law Group PLLC.

Procedural History

3. Plaintiffs', former employees of Defendants', commenced this action on May 14, 2012² seeking recovery of unpaid minimum wage, overtime and spread of hours pay pursuant to the Fair Labor Standards Act ("FLSA") and the New York Labor Law ("NYLL"). The action sought to recover unpaid overtime pay allegedly owed to them for hours worked in excess of 40 in a workweek at a rate not less than time and one-half their regular rates of pay, and spread of hours pay in violation of state law.
4. Plaintiffs, Antonio De Jesus, Sergio Francisco, Juan Gutierrez, Alexander Francisco, Alexander Francisco, Justo Acevedo, Jamie Luna Pujols, Marcos Bonola-Lucero, Ruben Nunez, Gustavo Esquivel, Luis Perez and Javier Cruz were employees of Defendants who are alleged to have owned and operated a diner in the county of Queens, New York. The Plaintiffs were alleged to have been responsible for cooking and/or preparing food, washing dishes, cleaning the restaurant and waiting tables operated by Defendants.
5. Defendants answered the Complaint on December 6, 2013. Defendants maintained that they complied with all the laws applicable to their compensation of employees, claimed that certain Plaintiffs were exempt because they had supervisory responsibilities, and claimed that certain Defendants were not considered "owners" under the FLSA.

The Time and Labor Expended by Counsel

6. Counsel conducted a thorough investigation into the underlying merit of the Plaintiffs' potential claims and potential defenses to liability. Counsel for Plaintiffs interviewed all

² On October 3, 2013, Plaintiffs filed a related case, De Jesus v. 60-05 Main Street Enterprises Corp., Case No. 13-CV-5492. By Order dated October 9, 2013, both cases were consolidated thereby leaving a single operative action for Plaintiffs ("Action:").

Plaintiffs regarding their job duties, the hours they spent working for Defendants and their compensation.

Plaintiffs Aggressively Prosecuted their Claims

7. After conducting a significant investigation into the facts of this case, including a review of payroll records, employment documents, time schedules, conducting multiple depositions, the parties engaged in extensive negotiations to resolve the matter including attending multiple mediations. Plaintiffs' counsel conducted a thorough review of payroll records and time records provided by Defendants. Both parties participated in a mediation, 12 depositions and multiple telephone conferences, during which the hours worked by Plaintiffs, the wages paid to Plaintiffs' and the relief available under the FLSA and NYLL was discussed. The negotiations involved multiple telephone conferences over the course of several years, and culminated in a full day mediation on March 20, 2015, wherein the parties reached a settlement in principle.

The Relief Obtained on Behalf of Plaintiffs

8. Pursuant to the agreement reached by the parties, the Defendants shall pay up to the sum of \$171,000.00. Each Plaintiff will receive an amount related to their period of employment with Defendants. Pursuant to the Parties' Settlement Agreement, Defendants agreed to pay Plaintiffs' counsel an agreed upon amount of \$50,497.00 for attorneys' fees pursuant to the terms of the Settlement Agreement. Plaintiffs now seek an Order approving and awarding Plaintiffs' counsels attorneys' fees in the amount of \$50,497.00, which includes the reimbursement of expenses of \$2,665.94.
9. Plaintiffs' Counsel agreed to commence this action on a contingency fee basis, with no fees to be recovered in the event of a negative outcome, and advanced the fees and costs

necessary to prosecute the action. Despite substantial and varied legal obstacles to recovering damages from Defendants, Bell Kilada, P.L.L.C. accepted this case and successfully achieved a favorable settlement.

10. Counsel for Plaintiffs was zealous in its pursuit of their clients' litigation objectives. The quality of their representation is evidenced by their outstanding result obtained on behalf of all Plaintiffs'.
11. The quality of the representation is also demonstrated by the backgrounds and experience of the lawyers prosecuting this action. Counsel practices exclusively in the area of labor and employment law.

Counsel's Background

12. The attorneys who worked primarily on this action were Melissa Beekman, Andrea Batres, Mordy Yankovich, Jonathan Bell and Steven Guerra. Mr. Jonathan Bell graduated from Brooklyn Law School in Brooklyn, New York in 2000 and has approximately 15 years' experience practicing labor and employment law. Mr. Bell was admitted to practice law in September 2000. Mr. Bell was generally involved in the more complex elements of this litigation including negotiation, settlement and court conferences.
13. Mr. Bell began his career as an associate at Wilson Elser Moskowitz Edelman & Dicker LLP. In 2001, Mr. Bell worked as Of-Counsel with the Law Firm of Albert Loew. In or about 2002, Mr. Bell left this law firm to form the Law Office of Jonathan Bell, the predecessor firm to the law firm of Bell Kilada, P.L.L.C. Mr. Bell is admitted to practice in the federal Southern District and Eastern District Courts of New York. He has represented hundreds of employees in court cases, most of which have been satisfactorily resolved prior to trial. Mr. Bell's regular hourly rate is \$375.00.

14. I graduated from Brooklyn Law School in June 2002, and have practiced exclusively in the area of employment law since I was admitted to the New York State bar in 2002. I am also admitted to practice in the federal Southern District of New York and Eastern District of New York.
15. In September 2002, I began my legal career at Epstein, Becker & Green, P.C., and practiced exclusively in the area of labor and employment. Currently, I represent employers and employees in workplace litigation matters. I regularly participate in all aspects of litigation for both plaintiff and management, including trial and administrative proceedings before the NYS Department of Labor and the U.S. Equal Employment Opportunity Commission. I regularly advise employers on all areas of employment law, including discrimination, termination and personnel practices to ensure compliance with all federal and state laws. My regular hourly rate is \$300.00.
16. Ms. Batres graduated from Hofstra University School of Law in 2010 and was admitted to the New York State Bar in June 2011. Ms. Batres was employed as an associate attorney at the Taub Law Firm in New York from April to December 2011, where she was responsible for all aspects of pretrial discovery, argued motions and conducted hearings. From December 2011 to August 2012, Ms. Batres was employed as a litigation associate with Bruno, Gerbino, and Soriano, LLP, an insurance defense firm located in Melville, New York. Ms. Batres was employed as a litigation associate at Frank & Associates, P.C. from in or about August 2012 to on or about October 2013. At Frank and Associates, P.C., Ms. Batres handled the prosecution of wage and hour claims brought under the FLSA and NYLL in the E.D.N.Y. and S.D.N.Y. Ms. Batres commenced her employment with the Law Office of Jonathan Bell and Bell Kilada PLLC on or about

June 2014. She currently represents federal and private sector employees in various forums specializing in wage and hour class and collective actions brought under the FLSA and NYLL. Ms. Batres' regular hourly rate is \$250.00.

17. Mr. Mordy Yankovich graduated from Hofstra University School of Law in 2011. Mr. Yankovich is admitted to practice in the State of New York and State of New Jersey as well as the U.S. District Court for the Southern and Eastern Districts of New York and District of New Jersey. In November 2012, Mr. Yankovich commenced his employment with Bell Law Group, PC, formerly Bell Kilada, P.L.L.C. Mr. Yankovich has represented federal and private sector employees in various federal courts and administrative forums including various wage and hour cases in both the E.D.N.Y. and S.D.N.Y. Mr. Yankovich's regular attorney hourly rate is \$250.00.

18. Mr. Steven Guerra graduated from Hofstra University School of Law in 2010. Mr. Guerra was employed with The Law Office of Jonathan Bell from 2012 until 2013 and represented Federal employees in various courts and administrative forums.

Hours Expended on this Litigation

19. In support of this application, Plaintiffs' counsel has submitted contemporaneous time records, annexed hereto as Exhibit A. These records were entered directly into a computer; a search of the database by the client's name yielded the records provided to the Court with this motion. The records reflect the specific tasks performed, identifies the attorney who performed each task, and shows the length of time the attorney spent on each particular task.
20. As documented in the attached timesheets, Bell Kilada, P.L.L.C. has spent 456.30 hours since the inception of this case. The time was reasonably spent on the various tasks

indicated and the records were kept in a contemporaneous fashion. The attorneys' time was not redundant nor excessive.

21. The contemporaneous time records demonstrate that the Bell Kilada, PLLC firm was prudent in its use of attorney time and labor. Accordingly, these hours should be used in the calculation of Plaintiffs' reasonable attorneys' fees and Plaintiffs motion for fees in the total amount of \$50,497.00.

Dated: Garden City, New York
December 4, 2015

/s/
Melissa Beekman, Esq.

Project Summary

Date Start: 12/1/2010 | Date End: 12/3/2015 | Clients: Palace Billing | Projects: | Users: | Account Managers: All

Date	User	Description	Rate/ Unit Price	Labor Time/ Quantity	Billable Time/ Cost Price	Bill Amt/ Sell Price
Palace Billing						
Wage and Hour						
04/18/2012	Jonathan Bell	DL--Draft Complaint	\$250.00 hr	7.80	7.80	\$1,950.00
04/23/2012	Jonathan Bell	DL--Review and edit complaint	\$250.00 hr	1.20	1.20	\$300.00
05/25/2012	Jonathan Bell	Process server fee: George Mantzikos	\$49.00 ea	1.00	\$49.00	\$49.00
05/25/2012	Nikki LaRosa	Summons and complaint served on defendant	\$55.00 ea	1.00	\$55.00	\$55.00
09/20/2012	Steven Guerra	Initial Disclosure	\$250.00 hr	2.00	2.00	\$500.00
02/18/2013	Nikki LaRosa	Service upon George Mantzikos 5/25/12	\$49.00 ea	1.00	\$49.00	\$49.00
02/18/2013	Mordy Yankovich	Review file in preparation for drafting discovery requests	\$250.00 hr	0.80	0.80	\$200.00
02/18/2013	Mordy Yankovich	Draft Discovery Requests	\$250.00 hr	2.90	2.90	\$725.00
02/18/2013	Mordy Yankovich	Draft motion to extend discovery period	\$250.00 hr	0.60	0.60	\$150.00
04/10/2013	Mordy Yankovich	Draft letter to judge regarding settlement conference and extension of discovery.	\$250.00 hr	0.50	0.50	\$125.00
04/23/2013	Mordy Yankovich	Schedule settlement conference	\$250.00 hr	0.30	0.30	\$75.00
05/29/2013	Mordy Yankovich	Interoffice discussion regarding amending complaint.	\$250.00 hr	0.80	0.80	\$200.00
05/29/2013	Mordy Yankovich	Draft amended complaint	\$250.00 hr	1.60	1.60	\$400.00
05/29/2013	Mordy Yankovich	Draft amended complaint.	\$250.00 hr	0.90	0.90	\$225.00
05/30/2013	Mordy Yankovich	Edit amended complaint.	\$250.00 hr	1.00	1.00	\$250.00
05/30/2013	Melissa Beekman	Review and revise amended complaint.	\$350.00 hr	1.20	1.20	\$420.00
06/06/2013	Mordy Yankovich	Call with plaintiffs regarding damages.	\$250.00 hr	1.00	1.00	\$250.00
06/06/2013	Melissa Beekman	Telephone call with Mordy and Interpreter to plaintiffs re: facts.	\$350.00 hr	1.00	1.00	\$350.00
07/02/2013	Melissa Beekman	Phone calls to Plaintiffs.	\$350.00 hr	0.40	0.40	\$140.00
08/02/2013	Mordy Yankovich	Interoffice discussion regarding settlement	\$250.00 hr	0.50	0.50	\$125.00
08/29/2013	Mordy Yankovich	Interoffice discussion regarding case strategy	\$250.00 hr	0.50	0.50	\$125.00
08/30/2013	Mordy Yankovich	Draft letter to adjourn settlement conference.	\$250.00 hr	0.40	0.40	\$100.00
09/03/2013	Melissa Beekman	Review and revise complaint.	\$350.00 hr	1.80	1.80	\$630.00
09/09/2013	Mordy Yankovich	Review and edit complaint.	\$250.00 hr	1.20	1.20	\$300.00
09/13/2013	Mordy Yankovich	Review complaint and draft summons	\$250.00 hr	1.10	1.10	\$275.00
09/16/2013	Melissa Beekman	Review revised complaint.	\$350.00 hr	0.50	0.50	\$175.00
09/25/2013	Mordy Yankovich	Edit Complaint	\$250.00 hr	0.50	0.50	\$125.00
09/30/2013	Melissa Beekman	Phone call to judge about settlement conference.	\$350.00 hr	0.30	0.30	\$105.00
10/01/2013	Mordy Yankovich	Edit and submit complaint	\$250.00 hr	1.00	1.00	\$250.00
10/01/2013	Melissa Beekman	Revise complaint documents.	\$350.00 hr	0.60	0.60	\$210.00
10/02/2013	Mordy Yankovich	Damages calculation for case - 12 plaintiffs in preparation for settlement conference	\$250.00 hr	5.00	5.00	\$1,250.00

10/02/2013	Mordy Yankovich	Research re; damages in preparation for settlement conference.	\$250.00 hr	1.30	1.30	\$325.00
10/02/2013	Melissa Beekman	Prepare for settlement conference.	\$350.00 hr	5.00	5.00	\$1,750.00
10/03/2013	Mordy Yankovich	Travel to and from settlement conference with magistrate judge.	\$250.00 hr	2.00	2.00	\$500.00
10/03/2013	Mordy Yankovich	Settlement conference with magistrate judge	\$250.00 hr	4.00	4.00	\$1,000.00
10/07/2013	Nikki LaRosa	LIRR travel to/from Preliminary Conference appearance	\$30.00 ea	1.00	\$30.00	\$30.00
10/08/2013	Mordy Yankovich	Draft stipulation for filing answer and send email to opposing counsel re: same.	\$250.00 hr	0.60	0.60	\$150.00
10/08/2013	Mordy Yankovich	Letter to Judge regarding consolidation of cases, discussion with Judge's law clerk regarding same.	\$250.00 hr	1.10	1.10	\$275.00
10/08/2013	Mordy Yankovich	Interoffice discussion regarding new complaint, consolidation and service.	\$250.00 hr	0.70	0.70	\$175.00
10/08/2013	Melissa Beekman	Phone call to clerks office re: consolidating cases.	\$350.00 hr	0.20	0.20	\$70.00
10/08/2013	Melissa Beekman	Review and revise letter re: consolidation.	\$350.00 hr	0.40	0.40	\$140.00
10/08/2013	Melissa Beekman	Draft affirmation of service.	\$350.00 hr	0.30	0.30	\$105.00
10/08/2013	Melissa Beekman	Prepare summons/complaint for service on Rick Ostrove.	\$350.00 hr	0.30	0.30	\$105.00
10/10/2013	Mordy Yankovich	Draft and file notice of appearance.	\$250.00 hr	0.30	0.30	\$75.00
11/01/2013	Melissa Beekman	Review Court's order and confer with Mordy re: next steps.	\$350.00 hr	0.20	0.20	\$70.00
11/05/2013	Mordy Yankovich	Draft status letter to the judge	\$250.00 hr	0.50	0.50	\$125.00
12/06/2013	Melissa Beekman	Review answer to complaint.	\$350.00 hr	0.50	0.50	\$175.00
01/28/2014	Mordy Yankovich	Discussion with opposing counsel re: settlement.	\$250.00 hr	0.10	0.10	\$25.00
02/04/2014	Mordy Yankovich	Interoffice discussion re: discovery plan.	\$250.00 hr	0.30	0.30	\$75.00
02/04/2014	Mordy Yankovich	Draft and discuss discovery plan	\$250.00 hr	0.50	0.50	\$125.00
02/05/2014	Mordy Yankovich	Call with opposing counsel re: discovery plan.	\$250.00 hr	0.20	0.20	\$50.00
02/05/2014	Melissa Beekman	Review initial disclosures and scheduling plan.	\$350.00 hr	0.60	0.60	\$210.00
02/06/2014	Mordy Yankovich	Preliminary Conference	\$250.00 hr	0.50	2.50	\$625.00
02/06/2014	Mordy Yankovich	Review file in preparation for preliminary conference	\$250.00 hr	0.60	0.60	\$150.00
02/06/2014	Mordy Yankovich	Draft Initial disclosures	\$250.00 hr	0.40	0.40	\$100.00
02/10/2014	Melissa Beekman	Review Initial disclosures.	\$350.00 hr	0.70	0.70	\$245.00
02/20/2014	Mordy Yankovich	Edit Damage Calculation	\$250.00 hr	2.00	2.00	\$500.00
02/20/2014	Mordy Yankovich	Edit Damages calculations	\$250.00 hr	0.30	0.30	\$75.00
02/24/2014	Melissa Beekman	Review and revise damage calculation.	\$350.00 hr	1.50	1.50	\$525.00
02/24/2014	Melissa Beekman	Review and revise damage calculation.	\$350.00 hr	1.50	1.50	\$525.00
02/25/2014	Mordy Yankovich	Review and edit damages calculations.	\$250.00 hr	0.70	0.70	\$175.00
02/28/2014	Mordy Yankovich	Edit damage calculations	\$250.00 hr	0.50	0.50	\$125.00
02/28/2014	Mordy Yankovich	Damages Calculations	\$250.00 hr	0.70	0.70	\$175.00
03/06/2014	Mordy Yankovich	Edit and submit damages calculations to opposing counsel.	\$250.00 hr	0.20	0.20	\$50.00
03/07/2014	Mordy Yankovich	Draft Interrogatories	\$250.00 hr	0.70	0.70	\$175.00
03/12/2014	Mordy Yankovich	Draft request for admissions	\$250.00 hr	0.50	0.50	\$125.00
03/12/2014	Mordy Yankovich	Draft Interrogatories	\$250.00 hr	0.70	0.70	\$175.00
03/12/2014	Mordy Yankovich	Draft Request for Production of Documents	\$250.00 hr	0.50	0.50	\$125.00
03/12/2014	Melissa Beekman	Review and revise discovery requests	\$350.00 hr	0.50	0.50	\$175.00
03/13/2014	Mordy Yankovich	Edit discovery requests.	\$250.00 hr	0.30	0.30	\$75.00
03/19/2014	Mordy Yankovich	Review/edit discovery requests	\$250.00 hr	0.50	0.50	\$125.00

03/20/2014	Mordy Yankovich	Review/edit and submit discovery requests.	\$250.00 hr	0.30	0.30	\$75.00
04/14/2014	Mordy Yankovich	Call with opposing counsel re: depositions	\$250.00 hr	0.30	0.30	\$75.00
04/14/2014	Melissa Beekman	Phone call to Defense counsel re: deposition schedule.	\$350.00 hr	0.30	0.30	\$105.00
04/20/2014	Mordy Yankovich	Review discovery responses.	\$250.00 hr	0.40	0.40	\$100.00
04/23/2014	Mordy Yankovich	Interoffice discussion re: palace diner discovery	\$250.00 hr	0.20	0.20	\$50.00
04/23/2014	Melissa Beekman	Review and respond to email re: Joint status letter.	\$350.00 hr	0.40	0.40	\$140.00
04/23/2014	Melissa Beekman	Research liability for failure to maintain documents/SJ	\$350.00 hr	1.40	1.40	\$490.00
04/25/2014	Mordy Yankovich	Email regarding discovery/depositions	\$250.00 hr	0.20	0.20	\$50.00
04/25/2014	Melissa Beekman	Review discovery requests from Defendants	\$350.00 hr	1.00	1.00	\$350.00
04/29/2014	Melissa Beekman	Review and revise status letter.	\$350.00 hr	0.30	0.30	\$105.00
04/30/2014	Mordy Yankovich	Review status letter for Judge.	\$250.00 hr	0.20	0.20	\$50.00
04/30/2014	Melissa Beekman	Review status letter revisions.	\$350.00 hr	0.30	0.30	\$105.00
05/06/2014	Melissa Beekman	Prepare for meeting with clients.	\$350.00 hr	1.50	1.50	\$525.00
05/07/2014	Mordy Yankovich	Review file in preparation for meeting with client	\$250.00 hr	1.00	1.00	\$250.00
05/07/2014	Mordy Yankovich	Meeting with clients re: depositions, settlement, interrogatories, case strategy	\$250.00 hr	3.50	3.50	\$875.00
05/07/2014	Melissa Beekman	Meeting with clients for discovery and dep prep.	\$350.00 hr	3.50	3.50	\$1,225.00
05/08/2014	Mordy Yankovich	Interoffice discussion re: settlement, depositions	\$250.00 hr	0.70	0.70	\$175.00
05/12/2014	Mordy Yankovich	Interoffice discussion re: settlement offers, email to Agency re: same.	\$250.00 hr	0.60	0.60	\$150.00
05/12/2014	Melissa Beekman	Phone call to plaintiffs that did not attend conference.	\$350.00 hr	0.40	0.40	\$140.00
05/13/2014	Melissa Beekman	Prepare settlement demand analysis for counter offers for each individual plaintiff.	\$350.00 hr	1.00	1.00	\$350.00
05/14/2014	Melissa Beekman	Prepare settlement demand and email same.	\$350.00 hr	0.50	0.50	\$175.00
05/19/2014	Melissa Beekman	Review documents received from Guitterez.	\$350.00 hr	0.40	0.40	\$140.00
05/28/2014	Mordy Yankovich	Review file in preparation for drafting discovery responses.	\$250.00 hr	1.20	1.20	\$300.00
05/28/2014	Mordy Yankovich	Draft discovery responses	\$250.00 hr	2.50	2.50	\$625.00
05/29/2014	Mordy Yankovich	Draft response to request for production of documents	\$250.00 hr	0.50	0.50	\$125.00
05/29/2014	Mordy Yankovich	Draft response to request for production of documents	\$250.00 hr	1.00	1.00	\$250.00
06/02/2014	Mordy Yankovich	Edit damages calculations	\$250.00 hr	2.00	2.00	\$500.00
06/02/2014	Mordy Yankovich	Review discovery responses	\$250.00 hr	0.50	0.50	\$125.00
06/02/2014	Melissa Beekman	Review and revise discovery responses.	\$350.00 hr	1.20	1.20	\$420.00
06/03/2014	Mordy Yankovich	Review discovery docs, email to agency counsel re: same.	\$250.00 hr	0.30	0.30	\$75.00
06/03/2014	Mordy Yankovich	Review/edit discovery responses. Email to opposing counsel re: same/depositions	\$250.00 hr	1.00	1.00	\$250.00
06/26/2014	Mordy Yankovich	Draft Notice of Depositions	\$250.00 hr	0.50	0.50	\$125.00
07/01/2014	Mordy Yankovich	Review discovery documents at opposing counsel's office	\$250.00 hr	1.20	1.20	\$300.00
07/01/2014	Melissa Beekman	Review documents.	\$350.00 hr	1.20	1.20	\$420.00
07/03/2014	Mordy Yankovich	Email to opposing counsel re: depositions	\$250.00 hr	0.20	0.20	\$50.00
07/03/2014	Melissa Beekman	Phone calls to Esquivel, Perez and Cruz to set up depositions.	\$350.00 hr	0.40	0.40	\$140.00
07/03/2014	Melissa Beekman	Phone calls to plaintiffs re: scheduling depositions.	\$350.00 hr	0.50	0.50	\$175.00
07/03/2014	Andrea Batres	2 Telephone conferences with Gustavo Esquivel regarding scheduling deposition and documents.	\$250.00 hr	0.50	0.50	\$125.00

07/03/2014	Andrea Batres	2 Telephone conferences with Javier Cruz concerning scheduling deposition.	\$250.00 hr	0.25	0.25	\$62.50
07/03/2014	Andrea Batres	Telephone conferences with Luis Perez concerning scheduling depositions	\$250.00 hr	0.40	0.40	\$100.00
07/03/2014	Andrea Batres	Meeting with MB and MY concerning scheduling of depositions.	\$250.00 hr	0.25	0.25	\$62.50
07/07/2014	Mordy Yankovich	Email to opposing counsel re: discovery/depositions	\$250.00 hr	0.30	0.30	\$75.00
07/07/2014	Andrea Batres	Telephone conference with client Luis Perez scheduling deposition and preparation date.	\$250.00 hr	0.25	0.25	\$62.50
07/07/2014	Andrea Batres	Drafted and filed Notice of Appearance	\$250.00 hr	0.40	0.40	\$100.00
07/08/2014	Melissa Beekman	Correspondence with Leeds re: scheduling depositions.	\$350.00 hr	0.20	0.20	\$70.00
07/08/2014	Andrea Batres	Telephone conference with client Gustavo Esquivel confirming appt. and requesting information regarding case.	\$250.00 hr	0.25	0.25	\$62.50
07/09/2014	Mordy Yankovich	Interoffice discussion re: discovery/depositions, email to opposing counsel re: same.	\$250.00 hr	1.20	1.20	\$300.00
07/09/2014	Melissa Beekman	Prep for meeting with Gustavo Esquivel.	\$350.00 hr	1.00	1.00	\$350.00
07/09/2014	Melissa Beekman	Review discovery responses and determine what info is outstanding.	\$350.00 hr	0.60	0.60	\$210.00
07/09/2014	Andrea Batres	Meeting with MY and MB. Analyzed discovery with MY and assisted in preparing e-mail to Leeds, Morell to request outstanding discovery.	\$250.00 hr	1.25	1.25	\$312.50
07/10/2014	Melissa Beekman	Prepare verifications for Gustavo and Ruben Nunez.	\$350.00 hr	0.70	0.70	\$245.00
07/10/2014	Andrea Batres	Met with Gustavo Esquivel and Ruben Nunez. Reviewed Interrogatory responses, obtained signed verification and prepared for upcoming depositions.	\$250.00 hr	1.75	1.75	\$437.50
07/10/2014	Andrea Batres	Initial receipt and review of client payroll records, time schedules and our damage calculation in preparation for meeting with client Gustavo Esquivel.	\$250.00 hr	1.75	1.75	\$437.50
07/13/2014	Mordy Yankovich	Draft letter regarding outstanding discovery/depositions to opposing counsel	\$250.00 hr	1.10	1.10	\$275.00
07/14/2014	Melissa Beekman	Review and revise email to Leeds re; discovery	\$350.00 hr	0.50	0.50	\$175.00
07/14/2014	Melissa Beekman	Review Rule 41 stip of discontinuance.	\$350.00 hr	0.20	0.20	\$70.00
07/14/2014	Andrea Batres	Analyzed additional plaintiff production and drafted rule 41 stipulation of the frcp.	\$250.00 hr	1.75	1.75	\$437.50
07/14/2014	Melissa Beekman	Email to Leeds re: discovery issues.	\$350.00 hr	0.30	0.30	\$105.00
07/15/2014	Andrea Batres	Telephone conference with 4 opt-in plaintiffs scheduling depositions, explaining what depositions are, appointments, case status and answering questions concerning same.	\$250.00 hr	1.25	1.25	\$312.50
07/18/2014	Andrea Batres	Called new opt-in plaintiffs and scheduled depositions.	\$250.00 hr	1.25	1.25	\$312.50
07/21/2014	Mordy Yankovich	Call with opposing counsel re: discovery issues.	\$250.00 hr	0.30	0.30	\$75.00
07/21/2014	Andrea Batres	Telephone conference with MB and MY concerning upcoming meeting.	\$250.00 hr	0.50	0.50	\$125.00
07/21/2014	Andrea Batres	Telephone conference with MY, MB, Michael Tompkins in support of all outstanding discovery issues.	\$250.00 hr	0.30	0.30	\$75.00
07/21/2014	Andrea Batres	Research into outstanding discovery issues before telephone conference with Leeds.	\$250.00 hr	0.50	0.50	\$125.00
07/21/2014	Mordy Yankovich	Interoffice discussion in preparation for conference with opposing counsel.	\$250.00 hr	0.50	0.50	\$125.00
07/21/2014	Andrea Batres	Telephone conference with Juan Gutierrez concerning upcoming deposition and date confirming.	\$250.00 hr	0.50	0.50	\$125.00
07/21/2014	Andrea Batres	Telephone conference with wife of Antonio Dejesus setting up time to speak to husband and scheduling deposition.	\$250.00 hr	0.25	0.25	\$62.50

07/22/2014	Mordy Yankovich	Email to opposing counsel re: depositions/discovery	\$250.00 hr	0.30	0.30	\$75.00
07/22/2014	Andrea Batres	Prepared client Javier Cruz for deposition.	\$250.00 hr	1.00	1.00	\$250.00
07/22/2014	Andrea Batres	Reviewed 200+ document sent from opposing counsel and separated by plaintiff.	\$250.00 hr	1.50	1.50	\$375.00
07/22/2014	Andrea Batres	Telephone conference with Marcos concerning outstanding verifications and scheduling meeting with 4 opt in.	\$250.00 hr	0.75	0.75	\$187.50
07/23/2014	Mordy Yankovich	Travel to Leeds Brown, review discovery documents.	\$250.00 hr	2.00	2.00	\$500.00
07/23/2014	Mordy Yankovich	Draft verifications, Interoffice discussion re: settlement	\$250.00 hr	0.50	0.50	\$125.00
07/23/2014	Andrea Batres	Client conference with Sergio Frandisco, Marcos Bonolo, Antonio Dejesus, Juan Gutierrez and Ruben Nunez. Preparing for depositions.	\$250.00 hr	2.00	2.00	\$500.00
07/23/2014	Andrea Batres	Document inspection at Leeds Brown offices.	\$250.00 hr	2.00	2.00	\$500.00
07/23/2014	Andrea Batres	Telephone conference with client Gustavo Esquivel regarding preparation for deposition. (Follow-up)	\$250.00 hr	1.00	1.00	\$250.00
07/23/2014	Andrea Batres	Follow up conversations with plaintiffs concerning outstanding depositions.	\$250.00 hr	0.75	0.75	\$187.50
07/24/2014	Andrea Batres	Re-review of payroll documents for plaintiff Luis Perez before the deposition.	\$250.00 hr	1.00	1.00	\$250.00
07/24/2014	Andrea Batres	Defended deposition of Gustavo Esquivel at Leeds Morelli.	\$250.00 hr	6.50	6.50	\$1,625.00
07/24/2014	Andrea Batres	Emails to and from Michael Tompkins concerning case and discovery.	\$250.00 hr	0.10	0.10	\$25.00
07/24/2014	Andrea Batres	Telephone conference with client Gustavo Esquivel concerning questions for deposition.	\$250.00 hr	0.25	0.25	\$62.50
07/24/2014	Andrea Batres	Travel time to and from Leeds Brown for deposition.	\$250.00 hr	0.50	0.50	\$125.00
07/25/2014	Mordy Yankovich	Interoffice discuss and email/phone call re: depositions	\$250.00 hr	0.30	0.30	\$75.00
07/28/2014	Mordy Yankovich	Interoffice discussion re: settlement.	\$250.00 hr	0.20	0.20	\$50.00
07/28/2014	Mordy Yankovich	Interoffice discussion re: discovery responses.	\$0 hr	0.30	0.30	\$0.00
07/28/2014	Mordy Yankovich	Call to Magistrate Judge re: discovery extension	\$250.00 hr	0.20	0.20	\$50.00
07/28/2014	Andrea Batres	Multiple conferences with MY concerning emails and confirming defendants depositions.	\$250.00 hr	0.50	0.50	\$125.00
07/28/2014	Andrea Batres	Telephone conference with Justo Acevedo concerning deposition scheduling and contents of deposition questions.	\$250.00 hr	0.75	0.75	\$187.50
07/29/2014	Mordy Yankovich	Interoffice discussion re: settlement.	\$250.00 hr	0.30	0.30	\$75.00
07/29/2014	Mordy Yankovich	Interoffice discussion re: discovery, depositions, settlement.	\$250.00 hr	0.20	0.20	\$50.00
07/30/2014	Mordy Yankovich	Interoffice discussion re: settlement	\$250.00 hr	0.30	0.30	\$75.00
07/30/2014	Andrea Batres	Met with clients Justo reyes and Jamie luna pujols prepared for deposition.	\$250.00 hr	2.50	2.50	\$625.00
07/31/2014	Mordy Yankovich	Email to opposing counsel re: discovery	\$250.00 hr	0.20	0.20	\$50.00
07/31/2014	Andrea Batres	Emails with Leeds Brown back and forth with MY.	\$250.00 hr	0.25	0.25	\$62.50
07/31/2014	Andrea Batres	Telephone conference with Justo Reyes Acevedo.	\$250.00 hr	0.25	0.25	\$62.50
08/01/2014	Andrea Batres	Prepared client and review interrogatory responses. (Luis Perez)	\$250.00 hr	2.00	2.00	\$500.00
08/01/2014	Andrea Batres	Defended plaintiff's deposition.	\$250.00 hr	4.50	4.50	\$1,125.00
08/01/2014	Andrea Batres	Time to Leeds Brown for deposition.	\$250.00 hr	0.50	0.50	\$125.00
08/04/2014	Mordy Yankovich	Research prior cases involving Main Street Enterprises	\$250.00 hr	0.40	0.40	\$100.00
08/04/2014	Andrea Batres	Prepared client for deposition Jamie Luna Pujols.	\$250.00 hr	1.00	1.00	\$250.00
08/04/2014	Andrea Batres	Telephone conference with Plaintiff Jamie Luna Pujols concerning depositions.	\$250.00 hr	0.25	0.25	\$62.50

08/04/2014	Andrea Batres	Telephone conference with Plaintiff Sergio Francisco concerning deposition.	\$250.00 hr	0.25	0.25	\$62.50
08/04/2014	Andrea Batres	Initial receipt and review of emails to and from opposing counsel with MY.	\$250.00 hr	0.25	0.25	\$62.50
08/05/2014	Mordy Yankovich	Research prior cases involving Main Street Enterprises	\$250.00 hr	0.80	0.80	\$200.00
08/05/2014	Andrea Batres	Prepared client for deposition and obtained signature for interros.	\$250.00 hr	1.00	1.00	\$250.00
08/05/2014	Andrea Batres	Defended deposition of plaintiff Jamie luna pujols.	\$250.00 hr	7.00	7.00	\$1,750.00
08/05/2014	Andrea Batres	Travel time to Leeds Brown.	\$250.00 hr	0.25	0.25	\$62.50
08/05/2014	Andrea Batres	Travel time to Leeds Brown.	\$250.00 hr	0.25	0.25	\$62.50
08/06/2014	Mordy Yankovich	Interoffice discussion re: discovery, settlement	\$250.00 hr	0.20	0.20	\$50.00
08/06/2014	Andrea Batres	Initial receipt and review of notice of depositions for all remaining plaintiffs, telephone conferences with Ruben Nunez and Juan Gutierrez.	\$250.00 hr	1.25	1.25	\$312.50
08/07/2014	Andrea Batres	Telephone conference with Alexander Reyes Francisco regarding adjourning deposition.	\$250.00 hr	0.25	0.25	\$62.50
08/08/2014	Mordy Yankovich	Draft amended complaint, Interoffice discussion re: same.	\$250.00 hr	0.50	0.50	\$125.00
08/08/2014	Mordy Yankovich	Review and send supplemental discovery production.	\$250.00 hr	0.20	0.20	\$50.00
08/08/2014	Andrea Batres	Review of Pay stubs and documents produced for Ruben Nunez and Juan Gutierrez in preparation for depositions of client.	\$250.00 hr	2.50	2.50	\$625.00
08/11/2014	Mordy Yankovich	Interoffice discussion re: settlement	\$250.00 hr	0.40	0.40	\$100.00
08/11/2014	Mordy Yankovich	Draft letter for amended complaint	\$250.00 hr	0.60	0.60	\$150.00
08/11/2014	Andrea Batres	Preparation of plaintiff Ruben Nunez for deposition.	\$250.00 hr	2.00	2.00	\$500.00
08/11/2014	Andrea Batres	Deposition of Plaintiff Ruben Nunez at Leeds Brown.	\$250.00 hr	6.00	6.00	\$1,500.00
08/12/2014	Mordy Yankovich	Draft verification, amendments to discovery responses, edit damages calc., interoffice discussion re: same.	\$250.00 hr	0.50	0.50	\$125.00
08/12/2014	Andrea Batres	Travel time to Leeds for deposition of Juan Gutierrez.	\$250.00 hr	0.40	0.40	\$100.00
08/12/2014	Andrea Batres	Deposition of Juan Gutierrez.	\$250.00 hr	5.00	5.00	\$1,250.00
08/14/2014	Andrea Batres	Telephone conference with Justo Reyes re: deposition	\$250.00 hr	0.50	0.50	\$125.00
08/15/2014	Mordy Yankovich	Draft notice of depositions	\$250.00 hr	0.30	0.30	\$75.00
08/15/2014	Andrea Batres	Telephone conference with Rick Ostrove and Brett with JB and MY	\$250.00 hr	0.75	0.75	\$187.50
08/15/2014	Andrea Batres	Research: other defendants	\$250.00 hr	1.25	1.25	\$312.50
08/15/2014	Andrea Batres	Meeting with MY regarding case strategy.	\$250.00 hr	0.50	0.50	\$125.00
08/18/2014	Andrea Batres	Telephone conference with Sergio Francisco concerning other witnesses and names of potential witnesses.	\$250.00 hr	0.50	0.50	\$125.00
08/19/2014	Mordy Yankovich	Draft amended notices of deposition, interoffice discussion re: same	\$250.00 hr	0.40	0.40	\$100.00
08/19/2014	Andrea Batres	Initial receipt and review of Gustavo esquivel deposition transcript.	\$250.00 hr	1.75	1.75	\$437.50
08/19/2014	Mordy Yankovich	review/edit amended complaint and letter re: amended complaint	\$250.00 hr	0.70	0.70	\$175.00
08/20/2014	Andrea Batres	Telephone conference with Juan Gutierrez.	\$250.00 hr	0.25	0.25	\$62.50
08/21/2014	Mordy Yankovich	Review/edit letter re: amended complaint	\$250.00 hr	0.20	0.20	\$50.00
08/21/2014	Nikki LaRosa	Reporter's transcript of the deposition of Luis Perez, taken 8/21/14.	\$562.65 ea	1.00	\$562.65	\$562.65
08/22/2014	Andrea Batres	Initial receipt and review of email from Brett Cohen discussing outstanding depositions/motion to amend.	\$250.00 hr	0.10	0.10	\$25.00
08/22/2014	Andrea Batres	Telephone conference with Jaime Luna Pujols.	\$250.00 hr	0.25	0.25	\$62.50
08/25/2014	Andrea Batres	Telephone conference with Justo Reyes concerning the remaining depositions, future offers of judgment and case status.	\$250.00 hr	0.40	0.40	\$100.00

08/25/2014	Andrea Batres	Initial receipt and review of letter to extend discovery.	\$250.00 hr	0.20	0.20	\$50.00
08/25/2014	Andrea Batres	Initial receipt and review of deposition of Luis Perez and review of first half of deposition.	\$250.00 hr	1.00	1.00	\$250.00
08/27/2014	Andrea Batres	Telephone conference with Juan Gutierrez concerning case.	\$250.00 hr	0.25	0.25	\$62.50
08/28/2014	Melissa Beekman	Review Rule 68 offer of judgments received from Defense counsel.	\$350.00 hr	0.50	0.50	\$175.00
08/28/2014	Andrea Batres	Initial receipt and review of offers of judgment and notice of depositions.	\$250.00 hr	0.50	0.50	\$125.00
08/29/2014	Andrea Batres	Presented offer of judgment to client.	\$250.00 hr	0.25	0.25	\$62.50
09/02/2014	Andrea Batres	Telephone conference with client Gustavo Esquivel regarding settlement offer.	\$250.00 hr	0.25	0.25	\$62.50
09/04/2014	Andrea Batres	Initial receipt and review of depositions of 3 plaintiffs depositions.	\$250.00 hr	4.00	4.00	\$1,000.00
09/05/2014	Andrea Batres	Telephone conference with Alexander Reyes Francisco.	\$250.00 hr	0.25	0.25	\$62.50
09/05/2014	Andrea Batres	Telephone conference relaying rule 68 offer of judgment to plaintiffs.	\$250.00 hr	0.50	0.50	\$125.00
09/10/2014	Mordy Yankovich	Review discovery documents/payroll records in preparation for deposition	\$250.00 hr	1.40	1.40	\$350.00
09/10/2014	Mordy Yankovich	Review client's deposition transcript in preparation for deposition	\$250.00 hr	1.40	1.40	\$350.00
09/10/2014	Mordy Yankovich	Call with plaintiffs re: settlement	\$250.00 hr	0.80	0.80	\$200.00
09/10/2014	Mordy Yankovich	Review Discovery Responses in preparation for deposition	\$250.00 hr	0.70	0.70	\$175.00
09/10/2014	Mordy Yankovich	Call with clients re: settlement	\$250.00 hr	1.40	1.40	\$350.00
09/10/2014	Andrea Batres	Researched and prepared motion to amend complaint.	\$250.00 hr	3.50	3.50	\$875.00
09/11/2014	Mordy Yankovich	Review client's deposition transcript in preparation for deposition	\$250.00 hr	1.60	1.60	\$400.00
09/11/2014	Mordy Yankovich	Meeting to prepare for Mantzikos Deposition	\$250.00 hr	5.50	5.50	\$1,375.00
09/11/2014	Mordy Yankovich	Prepare outline for Mantzikos deposition	\$250.00 hr	2.40	2.40	\$600.00
09/11/2014	Andrea Batres	Assisted MY in preparation for deposition, compiled depositions, deposition outline of Juan Gutierrez and assisted in outline.	\$250.00 hr	5.50	5.50	\$1,375.00
09/12/2014	Mordy Yankovich	Review outline, review/prepare exhibits for deposition	\$250.00 hr	1.40	1.40	\$350.00
09/12/2014	Nikki LaRosa	Reporter's transcript of the deposition of George Mantzikos, taken 9/12/14	\$484.30 ea	1.00	\$484.30	\$484.30
09/12/2014	Mordy Yankovich	Deposition of George Mantzikos	\$250.00 hr	6.00	6.00	\$1,500.00
09/12/2014	Andrea Batres	Assisted MY on deposition of George Mantzikos.	\$250.00 hr	6.00	6.00	\$1,500.00
09/12/2014	Andrea Batres	Assisted in deposition preparation, morning of deposition.	\$250.00 hr	1.40	1.40	\$350.00
09/15/2014	Mordy Yankovich	Prepare deposition outline for Peter Markos	\$250.00 hr	1.20	1.20	\$300.00
09/15/2014	Mordy Yankovich	Call with Judge re: pending discovery issues.	\$250.00 hr	0.70	0.70	\$175.00
09/15/2014	Mordy Yankovich	Interoffice discussion re: settlement/discovery	\$250.00 hr	0.40	0.40	\$100.00
09/15/2014	Mordy Yankovich	Interoffice discussion re: offers of judgment/discovery	\$250.00 hr	0.30	0.30	\$75.00
09/15/2014	Andrea Batres	Meeting with MY concerning Palace.	\$250.00 hr	0.25	0.25	\$62.50
09/15/2014	Andrea Batres	Deposition preparation for defendant Peter Markos dep.	\$250.00 hr	5.50	5.50	\$1,375.00
09/16/2014	Mordy Yankovich	Peter Markos Deposition	\$250.00 hr	1.05	1.05	\$262.50
09/16/2014	Mordy Yankovich	Peter Markos Deposition	\$250.00 hr	3.70	3.70	\$925.00
09/16/2014	Mordy Yankovich	Prepare for deposition of Peter Markos	\$250.00 hr	0.70	0.70	\$175.00
09/16/2014	Andrea Batres	Took deposition of defendant Peter Markos.	\$250.00 hr	4.40	4.40	\$1,100.00
09/16/2014	Andrea Batres	Deposition preparation for Peter Markos, setting up exhibits and finalizing outline.	\$250.00 hr	2.00	2.00	\$500.00
09/19/2014	Mordy Yankovich	Draft email to opposing counsel re: discovery/depositions	\$250.00 hr	0.60	0.60	\$150.00
09/22/2014	Andrea Batres	Telephone conference with Jaime Luna Pujols.	\$250.00 hr	0.50	0.50	\$125.00

09/25/2014	Andrea Batres	Telephone conference with Gustavo Esquivel.	\$250.00 hr	0.25	0.25	\$62.50
09/25/2014	Andrea Batres	Telephone conference with Marcos Bonola.	\$250.00 hr	0.25	0.25	\$62.50
09/26/2014	Andrea Batres	Telephone conference with Sergio Francisco about upcoming deposition.	\$250.00 hr	0.25	0.25	\$62.50
09/26/2014	Andrea Batres	Initial receipt and review of status letter to court and approval. Emails to Brett Cohen.	\$250.00 hr	0.50	0.50	\$125.00
09/29/2014	Andrea Batres	Telephone conference with JB, MY and Rick Ostrove concerning rule 68 offers of judgment.	\$250.00 hr	0.25	0.25	\$62.50
09/29/2014	Andrea Batres	Prepared amendment to Justo Acevedo's discovery responses and damage calculations.	\$250.00 hr	2.00	2.00	\$500.00
09/30/2014	Andrea Batres	Telephone conference with client concerning deposition. Justo Reyes Acevedo.	\$250.00 hr	0.75	0.75	\$187.50
09/30/2014	Andrea Batres	Telephone conference with client Antonio Dejesus.	\$250.00 hr	0.25	0.25	\$62.50
10/01/2014	Andrea Batres	Deposition of Justo Reyes Acevedo.	\$250.00 hr	2.00	2.00	\$500.00
10/01/2014	Andrea Batres	Prepared client Justo Reyes Acevedo for deposition in office and had him execute verification and go over Interrogatory responses.	\$250.00 hr	1.50	1.50	\$375.00
10/01/2014	Andrea Batres	Telephone conference with client to prepare for deposition. Alexander Francisco.	\$250.00 hr	0.50	0.50	\$125.00
10/01/2014	Andrea Batres	Amended damage calculation for client Alexander Francisco.	\$250.00 hr	0.75	0.75	\$187.50
10/01/2014	Andrea Batres	Travel time to Leeds Brown for deposition.	\$250.00 hr	0.50	0.50	\$125.00
10/02/2014	Andrea Batres	Defended deposition of Plaintiff Alexander Francisco.	\$250.00 hr	5.50	5.50	\$1,375.00
10/02/2014	Andrea Batres	Prepared client Alexander Francisco and translated responses to defendants discovery requests.	\$250.00 hr	1.50	1.50	\$375.00
10/02/2014	Andrea Batres	Travel time to and from Leeds Brown for deposition.	\$250.00 hr	0.50	0.50	\$125.00
10/03/2014	Mordy Yankovich	Interoffice discussion re: counteroffers, draft email to opposing counsel re: counteroffers	\$250.00 hr	0.50	0.50	\$125.00
10/03/2014	Andrea Batres	Telephone conference with Brett Cohen regarding depositions.	\$250.00 hr	0.25	0.25	\$62.50
10/03/2014	Andrea Batres	Telephone conference with Jaime Luna Pujols concerning settlement.	\$250.00 hr	0.50	0.50	\$125.00
10/03/2014	Andrea Batres	Telephone conference with Luis Perez concerning settlement.	\$250.00 hr	0.30	0.30	\$75.00
10/03/2014	Andrea Batres	Telephone conference with MY regarding damage calculations.	\$250.00 hr	0.50	0.50	\$125.00
10/03/2014	Andrea Batres	Telephone conference with Sergio Francisco regarding upcoming deposition and possible settlement demand.	\$250.00 hr	0.50	0.50	\$125.00
10/03/2014	Andrea Batres	Telephone conference with client Ruben Nunez concerning settlement.	\$250.00 hr	0.30	0.30	\$75.00
10/03/2014	Andrea Batres	Telephone conference with Alexander Reyes Francisco.	\$250.00 hr	0.40	0.40	\$100.00
10/06/2014	Andrea Batres	Continuation of Juan Gutierrez deposition.	\$250.00 hr	2.50	2.50	\$625.00
10/06/2014	Andrea Batres	Preparation for continuation of deposition.	\$250.00 hr	1.00	1.00	\$250.00
10/06/2014	Andrea Batres	Travel time to deposition Juan Gutierrez.	\$250.00 hr	0.50	0.50	\$125.00
10/07/2014	Andrea Batres	Initial receipt and review of email from adversary Brett Cohen.	\$250.00 hr	0.25	0.25	\$62.50
10/08/2014	Mordy Yankovich	Review Mantzikos Dep. email to opposing counsel re: doc requests.	\$250.00 hr	0.70	0.70	\$175.00
10/08/2014	Mordy Yankovich	Draft subpoenas for depositions, locate addresses	\$250.00 hr	0.60	0.60	\$150.00
10/08/2014	Andrea Batres	Research on subpoenas and proper procedure including names of witnesses and checks.	\$250.00 hr	2.00	2.00	\$500.00
10/09/2014	Andrea Batres	Review of deposition transcript of George Mantzikos and wrote email to Ostrove.	\$250.00 hr	3.50	3.50	\$875.00
10/09/2014	Andrea Batres	Telephone conference with Sergio Francisco confirming new deposition date.	\$250.00 hr	0.20	0.20	\$50.00

10/09/2014	Andrea Batres	Telephone conference with Justo Acevedo concerning counter offer and deposition.	\$250.00 hr	0.20	0.20	\$50.00
10/15/2014	Nikki LaRosa	Service upon Victor Paniagua and John Mantzikos	\$300.54 ea	1.00	\$300.54	\$300.54
10/15/2014	Mordy Yankovich	Email/Interoffice discussion re: subpoenas amended complaint	\$250.00 hr	0.30	0.30	\$75.00
10/16/2014	Andrea Batres	Telephone conference with Brett Cohen concerning adjourning deposition.	\$250.00 hr	0.25	0.25	\$62.50
10/16/2014	Andrea Batres	Initial receipt and review of letter to extend discovery.	\$250.00 hr	0.30	0.30	\$75.00
10/17/2014	Andrea Batres	Telephone conference with Sergio Frandisco concerning deposition.	\$250.00 hr	0.50	0.50	\$125.00
10/20/2014	Andrea Batres	Telephone conference with Brett Cohen and conference with Judge Levy's chambers.	\$250.00 hr	0.50	0.50	\$125.00
10/20/2014	Andrea Batres	Telephone conference with Brett Cohen concerning depositions and outstanding discovery.	\$250.00 hr	0.40	0.40	\$100.00
10/21/2014	Andrea Batres	Telephone conference with Justo Reyes Acevedo concerning deposition.	\$250.00 hr	0.25	0.25	\$62.50
10/21/2014	Andrea Batres	Telephone conference with Justo Reyes concerning depositions.	\$250.00 hr	0.25	0.25	\$62.50
10/22/2014	Andrea Batres	Telephone conference with Luis Perez concerning upcoming deposition.	\$250.00 hr	0.20	0.20	\$50.00
10/23/2014	Mordy Yankovich	Paniagua depo.	\$250.00 hr	0.25	0.25	\$62.50
10/23/2014	Nikki LaRosa	Reporter's transcript of the statement on the record for Victor Paniagua, taken 10/23/14.	\$350.20 ea	1.00	\$350.20	\$350.20
10/23/2014	Mordy Yankovich	Prepare for deposition of Victor Paniagua	\$250.00 hr	0.80	0.80	\$200.00
10/23/2014	Andrea Batres	Sat in on deposition for oral statement. Victor Panagua.	\$250.00 hr	0.25	0.25	\$62.50
10/23/2014	Andrea Batres	Telephone conference with Marcos Bonolo concerning rule 68.	\$250.00 hr	0.25	0.25	\$62.50
10/28/2014	Mordy Yankovich	Interoffice discussion re: settlement	\$250.00 hr	0.40	0.40	\$100.00
10/28/2014	Andrea Batres	Initial receipt and review of email with offers of judgment.	\$250.00 hr	0.20	0.20	\$50.00
10/29/2014	Andrea Batres	Telephone conference with Juan Gutierrez concerning missing documents.	\$250.00 hr	0.25	0.25	\$62.50
10/30/2014	Andrea Batres	Telephone conference with Plaintiff Ruben Nunez.	\$250.00 hr	0.25	0.25	\$62.50
10/30/2014	Andrea Batres	Telephone conference with Jaime Luna Pujols accepting offer.	\$250.00 hr	0.50	0.50	\$125.00
10/30/2014	Andrea Batres	Prepared client Antonio DeJesus for deposition.	\$250.00 hr	1.00	1.00	\$250.00
10/31/2014	Andrea Batres	Deposition of Antonio De Jesus.	\$250.00 hr	7.00	7.00	\$1,750.00
10/31/2014	Andrea Batres	Travel time to and from Leeds Brown.	\$250.00 hr	0.50	0.50	\$125.00
11/03/2014	Mordy Yankovich	Interoffice convo re: discovery	\$250.00 hr	0.30	0.30	\$75.00
11/03/2014	Andrea Batres	Initial receipt and review of email from Attorney Michael Tompkins.	\$250.00 hr	0.30	0.30	\$75.00
11/04/2014	Mordy Yankovich	Prepare for John Mantzikos deposition	\$250.00 hr	1.80	1.80	\$450.00
11/04/2014	Mordy Yankovich	Review George deposition transcript in preparation for John's deposition	\$250.00 hr	0.40	0.40	\$100.00
11/05/2014	Mordy Yankovich	Prepare for deposition of John Mantzikos	\$250.00 hr	2.00	2.00	\$500.00
11/05/2014	Mordy Yankovich	Meeting with opposing counsel to discuss settlement/discovery	\$250.00 hr	0.40	0.40	\$100.00
11/05/2014	Mordy Yankovich	Deposition of John Mantzikos	\$250.00 hr	4.00	4.00	\$1,000.00
11/05/2014	Andrea Batres	Deposition of John Mantzikos	\$250.00 hr	4.00	4.00	\$1,000.00
11/05/2014	Andrea Batres	Prepared email correspondence to Leeds Brown.	\$250.00 hr	1.00	1.00	\$250.00
11/06/2014	Andrea Batres	Telephone conference with Gustavo Esquivel	\$250.00 hr	0.25	0.25	\$62.50
11/10/2014	Andrea Batres	Telephone conference with Justo Acevedo concerning attendance at deposition and final settlement demand	\$250.00 hr	0.25	0.25	\$62.50
11/12/2014	Mordy Yankovich	Deposition of Antonio De Jesus and Justo Acevedo	\$250.00 hr	8.00	8.00	\$2,000.00
11/12/2014	Andrea Batres	Telephone conference with Justo Acevedo and Antonio De Jesus.	\$250.00 hr	0.30	0.30	\$75.00
11/12/2014	Andrea Batres	Telephone conference with client Ruben Nunez.	\$250.00 hr	0.50	0.50	\$125.00

11/12/2014	Andrea Batres	Telephone conference with client Justo Acevedo.	\$250.00 hr	0.40	0.40	\$100.00
11/20/2014	Andrea Batres	Reviewed deposition of Antonio De Jesus.	\$250.00 hr	1.25	1.25	\$312.50
11/21/2014	Andrea Batres	Meeting with MY for Palace email.	\$250.00 hr	0.30	0.30	\$75.00
11/24/2014	Mordy Yankovich	Review conflict of interest case sent by opposing counsel	\$250.00 hr	0.20	0.20	\$50.00
11/24/2014	Mordy Yankovich	Research case from opposing counsel re: conflicts, Interoffice discussion re: same.	\$250.00 hr	0.20	0.20	\$50.00
11/24/2014	Mordy Yankovich	Interoffice discussion re: settlement/conflict of interest	\$250.00 hr	0.30	0.30	\$75.00
11/24/2014	Andrea Batres	Initial receipt and review of Dunton case.	\$250.00 hr	0.20	0.20	\$50.00
11/25/2014	Mordy Yankovich	Draft email to counsel re: conflicts, etc.	\$250.00 hr	0.50	0.50	\$125.00
11/25/2014	Mordy Yankovich	Draft subpoenas, consultation with clients re: settlement/discovery	\$250.00 hr	1.00	1.00	\$250.00
11/26/2014	Andrea Batres	Finalized subpoenas.	\$250.00 hr	1.00	1.00	\$250.00
12/02/2014	Mordy Yankovich	Email regarding addresses for witnesses, Interoffice discussion re: same.	\$250.00 hr	0.20	0.20	\$50.00
12/02/2014	Mordy Yankovich	Email regarding addresses for witnesses, Interoffice discussion re: same.	\$250.00 hr	0.20	0.20	\$50.00
12/03/2014	Andrea Batres	Telephone conference with Marcos Bonola. re: settlement check	\$250.00 hr	0.25	0.25	\$62.50
12/03/2014	Andrea Batres	Telephone conference with Marcos Bonola. re: settlement check	\$250.00 hr	0.25	0.25	\$62.50
12/03/2014	Andrea Batres	Finalized letter to each plaintiff, conflict waivers to each plaintiff.	\$250.00 hr	1.25	1.25	\$312.50
12/04/2014	Andrea Batres	Telephone conference with DOL. re: settlement.	\$250.00 hr	0.50	0.50	\$125.00
12/09/2014	Mordy Yankovich	Email to opposing counsel re: settlement	\$250.00 hr	0.20	0.20	\$50.00
12/11/2014	Mordy Yankovich	Interoffice discussion re: case strategy/settlement. Call with Justo re: same.	\$250.00 hr	0.30	0.30	\$75.00
12/11/2014	Mordy Yankovich	Interoffice discussion re: settlement	\$250.00 hr	0.30	0.30	\$75.00
12/11/2014	Mordy Yankovich	draft and file letter for extension of discovery	\$250.00 hr	0.60	0.60	\$150.00
12/11/2014	Andrea Batres	Telephone conference with client Justo Acevedo regarding testimony.	\$250.00 hr	1.00	1.00	\$250.00
12/11/2014	Andrea Batres	Meeting discussing case strategy and issues.	\$250.00 hr	0.40	0.40	\$100.00
12/11/2014	Andrea Batres	Telephone conference with Gustavo Esquivel.	\$250.00 hr	0.50	0.50	\$125.00
12/11/2014	Andrea Batres	Review of letter of extension.	\$250.00 hr	0.10	0.10	\$25.00
12/11/2014	Andrea Batres	Telephone conference with Sergio Francisco.	\$250.00 hr	0.40	0.40	\$100.00
12/11/2014	Andrea Batres	Telephone conference with Marcos Bonola.	\$250.00 hr	0.25	0.25	\$62.50
12/11/2014	Andrea Batres	Review of Mantzikos dep.	\$250.00 hr	0.75	0.75	\$187.50
12/12/2014	Mordy Yankovich	Call to Judge re: extension	\$250.00 hr	0.20	0.20	\$50.00
12/16/2014	Andrea Batres	Re-drafted letter to De Jesus and sent.	\$250.00 hr	0.25	0.25	\$62.50
12/18/2014	Mordy Yankovich	Review motion to compel and accompanying exhibits	\$250.00 hr	0.60	0.60	\$150.00
12/18/2014	Mordy Yankovich	Interoffice discussion re: Defendant's motion to compel	\$250.00 hr	0.30	0.30	\$75.00
12/18/2014	Andrea Batres	Initial receipt and review of motion to compel ad attachments, meeting with MY discussing same.	\$250.00 hr	0.45	0.45	\$112.50
12/19/2014	Mordy Yankovich	Call with client re: production of documents	\$250.00 hr	1.10	1.10	\$275.00
12/19/2014	Andrea Batres	Telephone conference with Alexander Francisco concerning outstanding discovery.	\$250.00 hr	0.25	0.25	\$62.50
12/19/2014	Andrea Batres	Telephone conferences with clients Ja, Ruben Nunez and Antonio De Jesus regarding outstanding documents.	\$250.00 hr	1.25	1.25	\$312.50
12/19/2014	Andrea Batres	Telephone conference with Alexander Francisco.	\$250.00 hr	0.25	0.25	\$62.50
12/22/2014	Mordy Yankovich	Phone call with opposing counsel re: discovery, Interoffice discussion re: same.	\$250.00 hr	0.30	0.30	\$75.00

12/23/2014	Mordy Yankovich	Draft subpoenas for witnesses, interoffice discussion re: same	\$250.00 hr	0.30	0.30	\$75.00
12/26/2014	Nikki LaRosa	Service on Blanca Duran 12/26/14; attempted service upon Eva Ballas 12/27/14.	\$170.00 ea	1.00	\$170.00	\$170.00
01/05/2015	Mordy Yankovich	interoffice discussion re: palace discovery/settlement	\$250.00 hr	0.50	0.50	\$125.00
01/07/2015	Mordy Yankovich	Call to Ms. Duran re: deposition	\$250.00 hr	0.20	0.20	\$50.00
01/07/2015	Andrea Batres	Write up for Attorney Kilada and phone call to Blanca Duran, potential witness.	\$250.00 hr	1.25	1.25	\$312.50
01/08/2015	Mordy Yankovich	Interoffice discussion re: palace discovery	\$250.00 hr	0.30	0.30	\$75.00
01/08/2015	Andrea Batres	Research on settlement agreements and mediators.	\$250.00 hr	1.00	1.00	\$250.00
01/09/2015	Nikki LaRosa	Reporter's transcript of the deposition of John Mantzikos, taken 11/5/14	\$445.25 ea	1.00	\$445.25	\$445.25
01/11/2015	Mordy Yankovich	Research case law re: producing bank statements etc.	\$250.00 hr	1.50	1.50	\$375.00
01/13/2015	Andrea Batres	Prepared for conference.	\$250.00 hr	0.75	0.75	\$187.50
01/13/2015	Andrea Batres	Telephone conference with Judge and attorneys.	\$250.00 hr	0.75	0.75	\$187.50
01/13/2015	Mordy Yankovich	Status call with Judge	\$250.00 hr	0.50	0.50	\$125.00
01/13/2015	Mordy Yankovich	Review file, correspondence from opposing counsel, interoffice discussion in preparation for status call with judge	\$250.00 hr	1.10	1.10	\$275.00
01/16/2015	Mordy Yankovich	Research/review list of mediators, email to opposing counsel re: same	\$250.00 hr	0.40	0.40	\$100.00
01/23/2015	Mordy Yankovich	Draft Settlement Agreement	\$250.00 hr	3.00	3.00	\$750.00
01/23/2015	Melissa Beekman	Research mediators.	\$350.00 hr	0.70	0.70	\$245.00
01/28/2015	Andrea Batres	Telephone conference with Justo concerning mediation and next steps.	\$250.00 hr	0.50	0.50	\$125.00
01/29/2015	Andrea Batres	Telephone conference with Juan Gutierrez.	\$250.00 hr	0.50	0.50	\$125.00
01/29/2015	Andrea Batres	Telephone conference with client Gustavo Esquivel.	\$250.00 hr	0.30	0.30	\$75.00
01/30/2015	Andrea Batres	Telephone call to James Ryan, Brett Cohen and email to mediator.	\$250.00 hr	0.25	0.25	\$62.50
02/02/2015	Andrea Batres	Telephone conference with mediator and Brett Cohen, emailed with details about pricing and documents.	\$250.00 hr	0.50	0.50	\$125.00
02/03/2015	Andrea Batres	Telephone conference with multiple Plaintiffs concerning mediation date and procedure, alos documents that need to be submitted.	\$250.00 hr	1.50	1.50	\$375.00
02/03/2015	Andrea Batres	Telephone conference with multiple Plaintiffs concerning mediation date and procedure, alos documents that need to be submitted.	\$250.00 hr	1.50	1.50	\$375.00
02/04/2015	Andrea Batres	Initial receipt and review of documents from Juan Gutierrez.	\$250.00 hr	0.75	0.75	\$187.50
02/06/2015	Andrea Batres	Prepared letter to Judge Levy.	\$250.00 hr	0.50	0.50	\$125.00
02/09/2015	Mordy Yankovich	Interoffice discussion re: mediator	\$250.00 hr	0.20	0.20	\$50.00
02/09/2015	Andrea Batres	Email correspondence with mediator and adversary.	\$250.00 hr	0.20	0.20	\$50.00
02/13/2015	Nikki LaRosa	Subpoena service upon Blanca Duran and Eva Ballas	\$170.00 ea	1.00	\$170.00	\$170.00
02/24/2015	Andrea Batres	Began researching and looking through documents in preparation for mediation statement due in March.	\$250.00 hr	1.75	1.75	\$437.50
02/25/2015	Andrea Batres	Correspondence with defendants counsel.	\$250.00 hr	0.20	0.20	\$50.00
02/26/2015	Mordy Yankovich	Review statements produced from client	\$250.00 hr	0.50	0.50	\$125.00
02/27/2015	Mordy Yankovich	Review/edit settlement agreement, email to opposing counsel re: docs, settlement	\$250.00 hr	1.00	1.00	\$250.00
02/27/2015	Andrea Batres	Meeting with my concerning documents that need to be sent to atty's and review of deposition.	\$250.00 hr	1.00	1.00	\$250.00
03/02/2015	Andrea Batres	Telephone conference with Marcos Bonola from Mexico. Re. Settlement and time frames. Explained mediation date and expected settlement check date.	\$250.00 hr	0.50	0.50	\$125.00

03/03/2015	Andrea Batres	Telephone conference with Juan Gutierrez concerning his depo transcript and amounts wanted for mediation.	\$250.00 hr	0.50	0.50	\$125.00
03/03/2015	Andrea Batres	Telephone conference with Gerald Lepp.	\$250.00 hr	0.30	0.30	\$75.00
03/03/2015	Andrea Batres	Finished with Juan Gutierrez second part of dep to include statements for mediation statement.	\$250.00 hr	0.75	0.75	\$187.50
03/11/2015	Mordy Yankovich	Review deposition transcripts in preparation for drafting mediation statements	\$250.00 hr	2.60	2.60	\$650.00
03/11/2015	Andrea Batres	Mediation statement for Juan Gutierrez, Sergio Francisco, Ruben Nunez and Alexander Francisco.	\$250.00 hr	4.00	4.00	\$1,000.00
03/12/2015	Mordy Yankovich	Review deposition transcripts in preparation for drafting mediation statements	\$250.00 hr	2.30	2.30	\$575.00
03/12/2015	Mordy Yankovich	Review deposition transcripts in preparation for drafting mediation statements	\$250.00 hr	2.30	2.30	\$575.00
03/13/2015	Andrea Batres	Finalized the Mediation statement.	\$250.00 hr	4.50	4.50	\$1,125.00
03/13/2015	Mordy Yankovich	draft/edit mediation statement	\$250.00 hr	2.90	2.90	\$725.00
03/13/2015	Mordy Yankovich	Review deposition testimony in preparation for drafting mediation statement	\$250.00 hr	2.80	2.80	\$700.00
03/13/2015	Mordy Yankovich	meeting regarding mediation statment, edit statement	\$250.00 hr	1.30	1.30	\$325.00
03/17/2015	Mordy Yankovich	Review deposition transcripts in preparation for mediation	\$250.00 hr	0.50	0.50	\$125.00
03/17/2015	Andrea Batres	Telephone conference with Sergio Francisco, Juan Gutierrez and Justo Acevedo concerning mediation and preparation.	\$250.00 hr	1.25	1.25	\$312.50
03/17/2015	Andrea Batres	Finalized, ecf'd letter, phone call with eastern district, phone call with Gerald Lepp, mediation administrator in Brooklyn courthouse.	\$250.00 hr	1.00	1.00	\$250.00
03/18/2015	Andrea Batres	Telephone conference with Justo Acevedo.	\$250.00 hr	0.50	0.50	\$125.00
03/18/2015	Andrea Batres	Telephone conference with Ruben Nunez.	\$250.00 hr	0.60	0.60	\$150.00
03/19/2015	Mordy Yankovich	review deposition transcripts and mediation statements in preparation for mediation	\$250.00 hr	2.50	2.50	\$625.00
03/19/2015	Mordy Yankovich	meeting in preparation for mediation	\$250.00 hr	0.40	0.40	\$100.00
03/19/2015	Mordy Yankovich	review deposition transcripts and mediation statements in preparation for mediation	\$250.00 hr	2.50	2.50	\$625.00
03/19/2015	Andrea Batres	Prepared for mediation.	\$250.00 hr	2.25	2.25	\$562.50
03/20/2015	Mordy Yankovich	prepare for mediation	\$250.00 hr	2.00	2.00	\$500.00
03/20/2015	Mordy Yankovich	mediation	\$250.00 hr	2.00	2.00	\$500.00
03/20/2015	Mordy Yankovich	mediation	\$250.00 hr	2.00	2.00	\$500.00
03/20/2015	Mordy Yankovich	mediation	\$250.00 hr	5.00	5.00	\$1,250.00
03/20/2015	Andrea Batres	Mediation held. settled.	\$250.00 hr	8.00	8.00	\$2,000.00
03/20/2015	Andrea Batres	Prepared for mediation,	\$250.00 hr	1.75	1.75	\$437.50
04/07/2015	Andrea Batres	Reviewed settlement agreement and certain provisions	\$250.00 hr	0.75	0.75	\$187.50
04/08/2015	Andrea Batres	Reviewed ad finalized agreement.	\$250.00 hr	0.60	0.60	\$150.00
04/09/2015	Melissa Beekman	Review settlement agreement.	\$350.00 hr	0.40	0.40	\$140.00
04/13/2015	Andrea Batres	Finalized and sent settlement agreement to leads.	\$250.00 hr	0.30	0.30	\$75.00
04/23/2015	Andrea Batres	Telephone conference with Justo Acevedo concerning agreement.	\$250.00 hr	0.30	0.30	\$75.00
05/06/2015	Andrea Batres	Telephone conference with Justo Reyes Acevedo, Ruben Nunez, Jaime Luna pujols about settlement.	\$250.00 hr	1.30	1.30	\$325.00
06/10/2015	Mordy Yankovich	Call with opposing counsel re: settlement	\$250.00 hr	0.30	0.30	\$75.00

06/12/2015	Mordy Yankovich	Interoffice discussion re: settlement, call with opposing counsel re: same	\$250.00 hr	0.50	0.50	\$125.00
06/16/2015	Mordy Yankovich	LM with opposing counsel re: settlement	\$250.00 hr	0.10	0.10	\$25.00
06/16/2015	Mordy Yankovich	Inter office discussion re: settlement agreement	\$250.00 hr	0.20	0.20	\$50.00
06/17/2015	Mordy Yankovich	call with opposing counsel re: settlement	\$250.00 hr	0.30	0.30	\$75.00
06/17/2015	Mordy Yankovich	LM for opposing counsel	\$250.00 hr	0.10	0.10	\$25.00
06/17/2015	Mordy Yankovich	Internal discussion re: settlement	\$250.00 hr	0.10	0.10	\$25.00
06/19/2015	Mordy Yankovich	interoffice discussion re: settlement, email to opposing counsel re: same.	\$250.00 hr	0.30	0.30	\$75.00
06/22/2015	Mordy Yankovich	LM for Brett Cohen re: settlement	\$250.00 hr	0.10	0.10	\$25.00
07/06/2015	Mordy Yankovich	Interoffice discussion re: settlement	\$250.00 hr	0.30	0.30	\$75.00
07/06/2015	Andrea Batres	Meeting with plaintiffs Justo Acevedo, Ruben Nunez, and Sergio Francisco. Telephone conference with Juan Gutierrez and Antonio De Jesus. Translation of settlement agreement.	\$250.00 hr	3.50	3.50	\$875.00
07/07/2015	Andrea Batres	Prepared emails to and from counsel concerning settlement agreement and interoffice discussion concerning same.	\$250.00 hr	0.50	0.50	\$125.00
07/22/2015	Mordy Yankovich	Review/edit agreement	\$250.00 hr	1.20	1.20	\$300.00
07/22/2015	Andrea Batres	review settlement agreement.	\$250.00 hr	0.25	0.25	\$62.50
07/23/2015	Mordy Yankovich	Review/edit agreement	\$250.00 hr	0.40	0.40	\$100.00
07/23/2015	Andrea Batres	Telephone conference with Justo Acevedo.	\$250.00 hr	0.30	0.30	\$75.00
07/23/2015	Andrea Batres	Telephone conference with Gustavo Esquivel, Ruben Nunez and calls to Luis Perez.	\$250.00 hr	0.75	0.75	\$187.50
07/27/2015	Andrea Batres	Review of Revised settlement agreement and emails with Leeds.	\$250.00 hr	0.25	0.25	\$62.50
07/27/2015	Mordy Yankovich	edit agreement	\$250.00 hr	0.40	0.40	\$100.00
07/28/2015	Mordy Yankovich	Review/edit agreement	\$250.00 hr	0.30	0.30	\$75.00
07/28/2015	Mordy Yankovich	Call re: settlement	\$250.00 hr	0.30	0.30	\$75.00
07/29/2015	Mordy Yankovich	Interoffice discussion re: settlement	\$250.00 hr	0.40	0.40	\$100.00
07/29/2015	Andrea Batres	Telephone conferences with Juan Gutierrez, Ruben Nunez and Luis Perez regarding settlement and Javier Cruz.	\$250.00 hr	1.00	1.00	\$250.00
08/20/2015	Andrea Batres	Telephone conference with Gustavo Esquivel.	\$250.00 hr	0.30	0.30	\$75.00
08/26/2015	Andrea Batres	Telephone conference with Gustavo concerning signature and settlement agreement.	\$250.00 hr	0.25	0.25	\$62.50
08/26/2015	Andrea Batres	Meeting with Gustavo and Ruben translating agreement to client.	\$250.00 hr	1.10	1.10	\$275.00
09/24/2015	Andrea Batres	Telephone conference with Marcos Bonola in Mexico and Gustavo Esquivel regarding settlement document, emails to Leeds.	\$250.00 hr	1.10	1.10	\$275.00
09/24/2015	Andrea Batres	Telephone conference with Marcos Bonola in Mexico and Gustavo Esquivel regarding settlement document, emails to Leeds.	\$250.00 hr	1.10	1.10	\$275.00
09/25/2015	Andrea Batres	Telephone conference with Justo Acevedo	\$250.00 hr	0.25	0.25	\$62.50
10/05/2015	Andrea Batres	Letter in response to status Order from Judge Levy and ECF'd.	\$250.00 hr	0.50	0.50	\$125.00
10/09/2015	Andrea Batres	Telephone conference with Justo Acevedo re: decision from Judge.	\$250.00 hr	0.30	0.30	\$75.00
10/20/2015	Andrea Batres	Telephone conference with Justo Reyes. Acevedo	\$250.00 hr	0.25	0.25	\$62.50
10/23/2015	Andrea Batres	Finalized Motion for Settlement following Tompkins corrections.	\$250.00 hr	3.50	3.50	\$875.00
10/26/2015	Mordy Yankovich	Review Cheeks case re: fairness hearing request	\$250.00 hr	0.50	0.50	\$125.00
11/05/2015	Mordy Yankovich	Review Order from Judge on Agreement interoffice discussion re: same	\$250.00 hr	0.30	0.30	\$75.00
Total Labor For Wage and Hour				456.30	458.30	\$118,190.00
Total Expense For Wage and Hour					\$2,665.94	\$2,665.94

Total For Wage and Hour			\$120,855.94
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Total Labor For Palace Billing	456.30	458.30	\$118,190.00
Total Expense For Palace Billing		\$2,665.94	\$2,665.94
Total For Palace Billing			\$120,855.94
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Grand Total Labor	456.30	458.30	\$118,190.00
Grand Total Expenses		\$2,665.94	\$2,665.94
Grand Total			\$120,855.94